6 June 2019

The South African Heritage Resources Agency
PO Box 4637
Cape Town
8001

Attention: Ms Natasha Higgitt

AN 18M WIDE (ON SURFACE) BOUNDARY IS LOCATED BETWEEN THE MMT AND THE TSHIPI BORWA MINE. TSHIPI AND MMT HAVE APPROVAL TO MINE THE 18M WIDE BOUNDARY PILLAR. ADDITIONAL CAPACITY IS REQUIRED TO STORE WASTE ROCK GENERATED AS PART OF MINING THE BOUNDARY PILLAR. TO CATER FOR THE ADDITIONAL STORAGE, IT IS PROPOSED THAT THE MAMATWAN SINTERFONTEIN AND THE TSHIPI EASTERN WASTE ROCK DUMPS ARE MERGED TO FILL THE VOID BETWEEN THE TWO DUMPS. MMT IS PROPOSING ON AMENDING THEIR APPROVED EMP TO CATER FOR THE MERGING OF THE WASTE ROCK DUMPS.- CASE ID: 13652

This letter refers to the interim comments (dated 31 May 2019) on our original exemption application dated 11 February 2019 refers.

The interim comments indicates, "*The assessment of palaeontological resources referred to in the motivational letter was not accepted as part of the application the report was submitted to i.e. SAHRIS Case ID 12573*."

In collaboration with our appointed palaeontologist, Mrs. Elize Butler, a palaeontological desktop study was done for the area the proposed application is situated one. This study:

Palaeontological Desktop Assessment for the Establishment of a Diesel Farm and a Haul Road for the Tshipi Borwa Mine Near Hotazel, in the John Toalo Gaetsewe District Municipality in the Northern Cape Province. CaseID: 10997

This study found that:
The site is completely underlain by the Late Caenozoic Kalahari Formation (Cretaceous to Tertiary). No literature record could be found of fossils from the Kalahari Formation close to Hotazel. Palaeontological evidence is restricted to a few pseudo-bone structures that are preserved in the limestone (Kudumane EIA 2010). No proof of any fossil material was collected from the rest of the Kalahari Formation.

The proposed development is thus unlikely to pose a substantial threat to local fossil heritage. In Palaeontological terms the significance is rated as low to very low negative. Consequently, pending the discovery of significant new fossil material here, no further specialist studies are considered to be necessary.

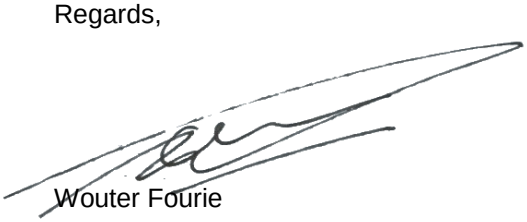
The desktop study for the above mention development was conducted in February 2017. According to the Interim Comment of 6 October 2017, SAHRA requested an amendment to the Desktop Study to **include an official Council of Geoscience map of the geology of the development area**. Refer to **Figure 1.**

CONCLUSION

It is our considered opinion that findings of the desktop are still relevant and valid for the proposed consolidation of the two dumps for the application under Case ID: 13652.

Any further comments or enquires can be refer to Wouter Fourie on +2712 332 5305 or wouter@pgsheritage.co.za

Regards,



Wouter Fourie
Accredited Professional Heritage Practitioner (APHP)
PGS Heritage Pty Ltd

Elize Butler
Professional Palaeontologist
Banzai Environmental

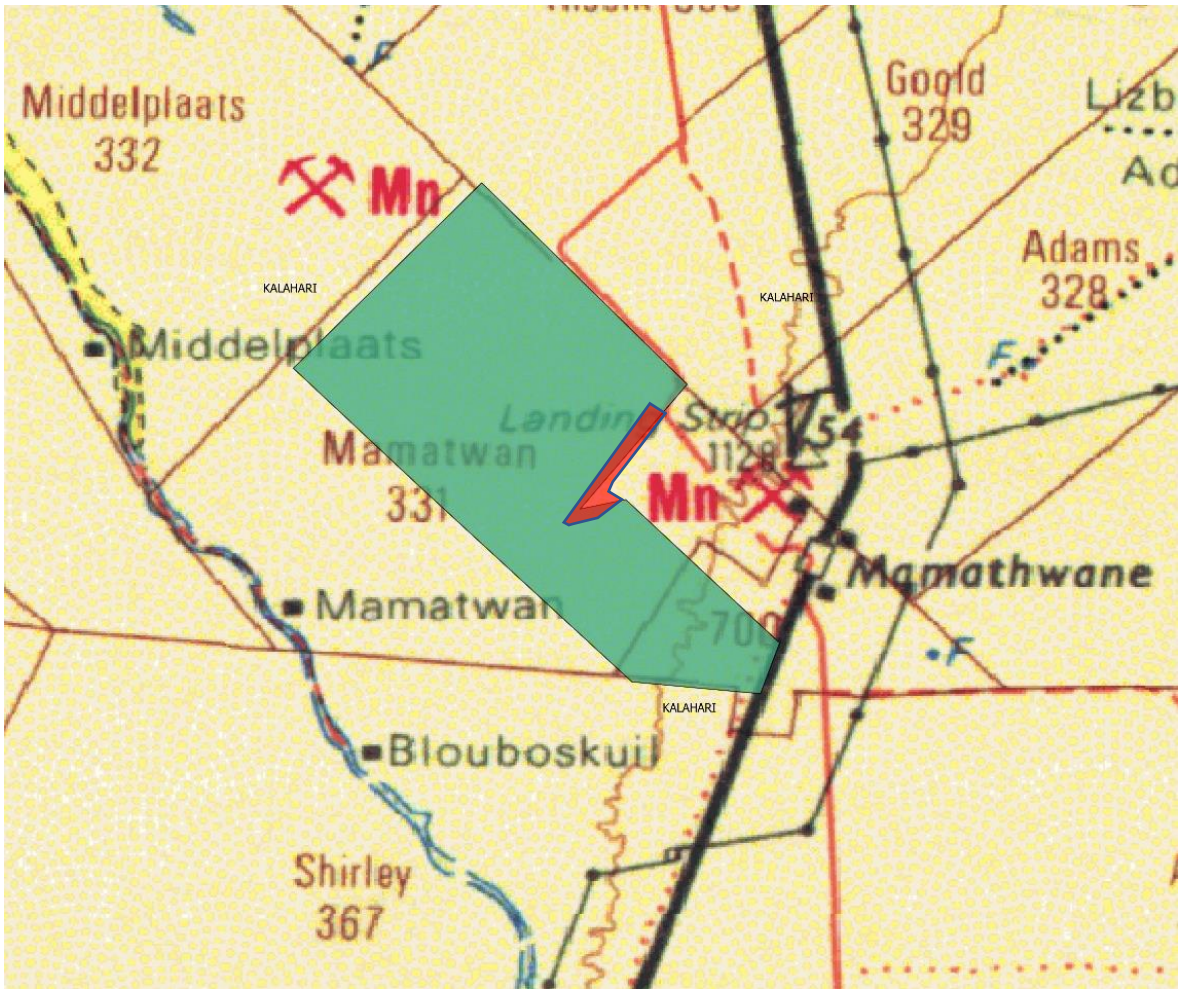


Figure 1. *Extract from the 1: 250 000 2722 Kuruman geological map (Council of Geoscience, Pretoria). The surface geology of the proposed Tshipi é Ntle Manganese Mine (Case ID: 10997 – Green area). The area of the consolidation of the two dumps for the application under Case ID: 13652 is shown in red.*